

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

R. Michael Best	:	
Keith Dougherty	:	
Docson Consulting LLC (SMLLC)	:	
Keith Dougherty Investments & Consulting	:	
LLC (SMLLC)	:	
	:	
	:	
<b>Plaintiff(s),</b>	:	<b>Civil Action NO: 1:14-CV-922</b>
	:	
<b>v.</b>	:	
<b>U.S. Food Inc et al</b>	:	
	:	<b>Frederick Motz (Judge)</b>
	:	
	:	<b>Filed Electronically</b>
	:	
	:	
<b>Defendant(s),</b>	:	<b>Jury Trial Demanded</b>
	:	
	:	
	:	

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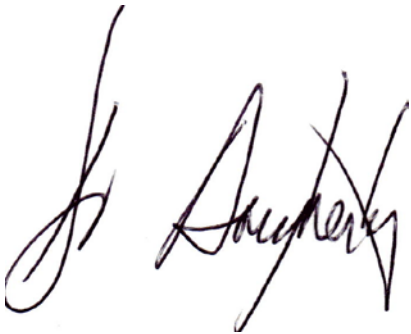
**Plaintiff's Motion For Reconsideration of the 7/2/2014  
"unconstitutional dismissal and or Recusal in the alternative"**

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**And now comes Keith Dougherty and R. Michael Best pro se and seek to Enter Default against the Cumberland County Sheriff, Cumberland County Prothonotary, Curtis Property Management, as well as U.S. Foods Inc., Robert Kodak, RICHARD Daniels for "procedural default" related to Rhino v. Berg Manufacturing;**

**Frederick Motz has exceeded the In Re Antar standard due to his "misplaced reliance on LR 101(a) from the District Court of MD" (never applicable in the Middle District of PA) now invalidated by Hobby Lobby as of 6/30/2014.**

**Respectfully Submitted,**

A handwritten signature in black ink, appearing to read "K. Dougherty". The signature is fluid and cursive, with the first letter of the last name being a large, stylized 'D'.

**Keith Dougherty, CFP®, CLU®, IAR, EA**  
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A handwritten signature in black ink, appearing to read "R. Michael Best". The signature is written over a horizontal line and is quite stylized, with the first letter of the first name being a large 'R'.

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**US Foods Inc. Delaware Division**

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**COLEMAN & GOGGIN**

**/s/Timothy J. McMahon**

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